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8 Joseph W. Charles  
9 State Bar #003038  
10 Attorneys for Debtor/Movant

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12  
13 **IN THE UNITED STATES BANKRUPTCY COURT**  
14 **FOR THE DISTRICT OF ARIZONA**

15 In re:  
16  
17 **TODD SCOTT PIERSON,**  
18  
19 **Debtor.**

20  
21 **TODD SCOTT PIERSON,**  
22  
23 **Movant,**

24  
25 **vs.**

26  
27 **KEYBANK,**  
28  
29 **Respondent.**

30 Chapter 13 Proceedings  
31  
32 Case No. 2:09-bk-22447-EWH

33  
34 **NOTICE OF FILING MOTION TO**  
35 **AVOID LIEN**

36  
37 RE: For the Third Deed of Trust on  
38 Real Property Located at  
39 10635 w. Lone Cactus Drive  
40 Peoria, Arizona 85382

41  
42 **TO DEBTORS/MOVANT, DEBTOR/MOVANT'S COUNSEL**  
43 **AND THE TRUSTEE AND OTHER PARTIES-IN-INTEREST**

44  
45 NOTICE IS HEREBY GIVEN pursuant to Local Rules of the United States  
46 Bankruptcy Court, Rule No. 4001-1(d), the Debtor/Movant has filed a Motion to Avoid  
47 Lien in the above-referenced Chapter 13 proceeding.

1 Any objection or response to the Motion to Avoid Lien must be in writing and the  
2 original filed with the Clerk of the United States Bankruptcy Court, with a copy served  
3 upon Debtor/Movant's attorney, JOSEPH W. CHARLES, P.C., 5704 W. Palmaire  
4 Avenue, Glendale, Arizona, 85311.  
5

6 NOTICE IS HEREBY FURTHER GIVEN that if no objection or response to the  
7 Motion to Avoid Lien is filed within twenty-three (23) days of the date of service of this  
8 Notice of Filing, Debtor/Movant's request that a dismissal may be granted without a  
9 hearing, upon the Debtor/Movant's filing a certificate of service and no objection.  
10

11 DATED this 11th day of June, 2010.  
12

13 **JOSEPH W. CHARLES, P.C.**  
14

15 By: /s/ Joseph W. Charles  
16 JOSEPH W. CHARLES  
17 5704 West Palmaire Avenue  
18 Post Office Box 1737  
19 Glendale, Arizona 85311  
20 Attorney for Debtor/Movant  
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2 The foregoing was electronically filed  
3 with the Clerk of the Court and a  
4 copy was mailed this 11th day of  
5 June, 2010, to:

6 All parties listed on the master mailing matrix attached; and

7 KeyBank  
8 c/o Weltman, Weinberg & Reis Co., LPA  
9 323 W. Lakeside Avenue, 2<sup>nd</sup> Floor  
10 Cleveland, OH 44113-1306

11 KeyBank  
12 c/o Henry I. Meyer III  
13 Chairman, President and CEO  
14 127 Public Square  
15 Cleveland, OH 44114-1306

16  
17 KeyCorp  
18 c/o Henry L. Meyer III  
19 Chairman, President and CEO  
20 127 Public Square  
21 Cleveland, OH 44114-1306

22  
23  
24  
25  
26  
27  
28  
17 /s/ S. Watkins